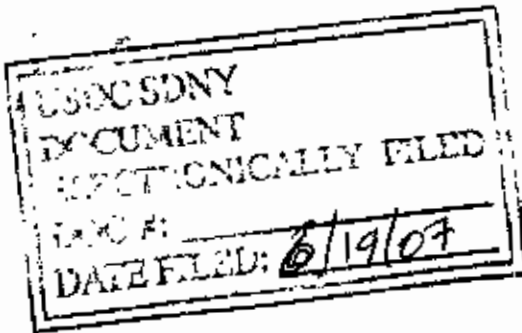


Baughman, J



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Compañía del Bajo Caroni (Caromin), C.A., *et al.*,
Plaintiffs,
v. Case No. 07-CV-3179 (NRB)
Bolivarian Republic of Venezuela, *et al.*,
Defendants.

STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO COMPLAINT

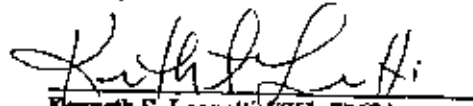
Plaintiffs Compañía del Bajo Caroni (Caromin), C.A and V.M.C. Mining Company, C.A. and Defendants the Bolivarian Republic of Venezuela and Ministry of Basic Industries and Mines hereby stipulate and agree that the time for Defendants to serve and file a response to Plaintiffs' Complaint be extended to July 23, 2007.

This stipulation is submitted without prejudice to the Defendants' defenses under the Foreign Sovereign Immunities Act, 28 U.S.C. § 1602 *et seq.* and other applicable defenses, including lack of subject matter and personal jurisdiction and service of process defenses.

Respectfully submitted,



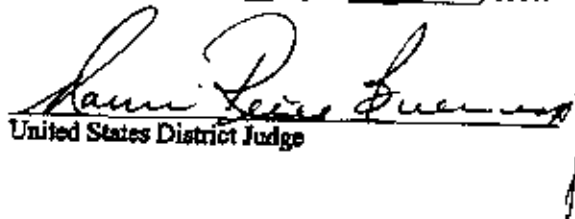
James Wilson Perkins (#JWP-6684)
Ronald W. Kleinman
Steven M. Schneebaum
Attorneys for Plaintiffs Compañia del Bajo
Caroni (Caromin) C.A. and V.M.C.
Mining Company, C.A.
GREENBERG TRAURIG LLP
MetLife Building
200 Park Avenue
New York, New York 10166
Telephone: 212-801-9200
Fax: 212-688-2449
800 Connecticut Avenue NW
Washington, D.C. 20006
Telephone: 202-331-3100



Kenneth S. Leonetti (#KL-7368)
Paul S. Reichler
Ronald E.M. Goodman
Attorneys for Defendants Bolivarian
Republic of Venezuela and Ministry of
Basic Industries and Mines
FOLEY HOAG LLP
1875 K Street, NW
Washington, D.C. 20006
Telephone: 202-223-1200
Fax: 202-785-6687

Date: June 13, 2007

SO ORDERED this 18th day of June, 2007:


United States District Judge